

Exhibit 2

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**AMENDED SHORT FORM COMPLAINT
FOR DAMAGES FOR INDIVIDUAL
CLAIMS AND DEMAND FOR JURY
TRIAL**

Plaintiff(s) named below, for their Complaint against Defendants named below,
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Margaret C. Moses

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
consortium claim:

N/A

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,
conservator):

Teresa M. Truitt as administrator of the Estate of Margaret Moses

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence
at the time of implant:

Virginia

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence
at the time of injury:

Virginia

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Virginia

7. District Court and Division in which venue would be proper absent direct filing:

District of Arizona, Phoenix Division

8. Defendants (check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other: _____

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

☐ Recovery® Vena Cava Filter

☒ G2® Vena Cava Filter

☐ G2® Express Vena Cava Filter

☐ G2® X Vena Cava Filter

☐ Eclipse® Vena Cava Filter

☐ Meridian® Vena Cava Filter

☐ Denali® Vena Cava Filter

☐ Other: _____

11. Date of Implantation as to each product:

First filter: October 8, 2009 (removed successfully November 2, 2009);

Second filter: September 13, 2010.

12. Counts in the Master Complaint brought by Plaintiff(s):

- | | | |
|-------------------------------------|------------------|--|
| <input checked="" type="checkbox"/> | Count I: | Strict Products Liability – Manufacturing Defect |
| <input checked="" type="checkbox"/> | Count II: | Strict Products Liability – Information Defect (Failure to Warn) |
| <input checked="" type="checkbox"/> | Count III: | Strict Products Liability – Design Defect |
| <input checked="" type="checkbox"/> | Count IV: | Negligence – Design |
| <input checked="" type="checkbox"/> | Count V: | Negligence – Manufacture |
| <input checked="" type="checkbox"/> | Count VI: | Negligence – Failure to Recall/Retrofit |
| <input checked="" type="checkbox"/> | Count VII: | Negligence – Failure to Warn |
| <input checked="" type="checkbox"/> | Count VIII: | Negligent Misrepresentation |
| <input checked="" type="checkbox"/> | Count IX: | Negligence <i>Per Se</i> |
| <input checked="" type="checkbox"/> | Count X: | Breach of Express Warranty |
| <input checked="" type="checkbox"/> | Count XI: | Breach of Implied Warranty |
| <input checked="" type="checkbox"/> | Count XII: | Fraudulent Misrepresentation |
| <input checked="" type="checkbox"/> | Count XIII: | Fraudulent Concealment |
| <input checked="" type="checkbox"/> | Count XIV: | Violations of Applicable <u>Virginia</u> Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices |
| <input type="checkbox"/> | Count XV: | Loss of Consortium |
| <input type="checkbox"/> | Count XVI: | Wrongful Death |
| <input checked="" type="checkbox"/> | Count XVII: | Survival |
| <input checked="" type="checkbox"/> | Punitive Damages | |
| <input type="checkbox"/> | Other(s): | _____ : (please state the facts supporting this Count in the space immediately below) |

13. Jury Trial demanded for all issues so triable?

- ☒ Yes
- ☐ No

1 RESPECTFULLY SUBMITTED this 15th day of April, 2019.

2 **SHRADER & ASSOCIATES, L.L.P.**

3 By: /s/ A. Layne Stackhouse

4 A. Layne Stackhouse

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10 *Attorney for Plaintiff*

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that on this 15th day of April, 2019, I electronically transmitted the
13 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal
14 of a Notice of Electronic Filing.
15

16 /s/A. Layne Stackhouse